

## Southeast Health District

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Rosemarie D. Parks, M.D., M.P.H.  
Health Director

April 11, 2018

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Room TW-A325  
Washington, D.C. 20554

Re: Immediate Waiver of the FY2017 RHC Funding Cap

Dear Ms. Dortch:

I write on behalf of the Ware County Board of Health to express our support of the Emergency Petition for Waiver of the Rural Health Care (RHC) Program Funding Cap Pending Conclusion of the Open Rulemaking, which was recently filed by the Schools, Health & Libraries Broadband (SHLB) Coalition.

Ware County Board of Health organizes and maintains the telehealth network for the Georgia Department of Public Health. The network was established in 2006 through the Rural Healthcare Telecom Program and consists of 225 circuits located throughout the state of Georgia. Majority of these sites are local health departments who provide a variety of vital and specialty services to communities, in rural locations. The ability of these sites to continue to provide quality healthcare services to Georgia's rural population depends heavily on Universal Service Funds administered via USAC.

The recent changes in funding have made budgeting and planning for the telehealth network nearly impossible. This is extremely difficult to do with any accuracy when funding commitments are not released until eight months into the funding/fiscal year. The increase to our telehealth circuit costs caused by these changes in Fund Year 2017 alone is approximately \$200,000.00 but could potentially be much more as 17 of our 466 forms are still under review by USAC. If the funding for the RHC Program doesn't stabilize, our state's telehealth network will not be able to continue to function within our current network model and will jeopardizes our ability to expand and provide access to medical services via telehealth for Georgia's rural population.

Thank you for carefully considering our comments and SHLB's emergency petition. While we hope long-term solutions to improve the RHC Program come from the open rulemaking docket, we also urge the Commission to take swift action to alleviate the more immediate problem caused by the recent funding shortages.

Sincerely,

Rosemarie D. Parks, MD, MPH  
District Health Director

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